

**STATEMENT OF POLICY IN TREATMENT OF
CUSTOMER PROPRIETARY NETWORK INFORMATION**

1. It is Transtelco, Inc., Bordercomm Partners LP, and XC Networks Ltd. (hereafter collectively referred to as “Transtelco”) policy not to use CPNI for any activity other than permitted by law. Any disclosure of CPNI to other parties (such as affiliates, vendors, and agents) occurs only if it is necessary to conduct a legitimate business activity related to the services already provided by the company to the customer. If the Company is not required by law to disclose the CPNI or if the intended use does not fall within one of the carve outs, the Company will first obtain the customer’s consent prior to using CPNI.
2. Customer Proprietary Network Information (CPNI) Definition: Information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier except that such term does not include subscriber list information.
3. Transtelco follows industry-standard practices to prevent unauthorized access to CPNI by a person other than the subscriber or Transtelco. However, Transtelco cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose personally identifiable information. Therefore:
 - A. If an unauthorized disclosure were to occur, Transtelco shall provide notification of the breach within seven (7) days to the United States Secret Service (“USSS”) and the Federal Bureau of Investigation (“FBI”).
 - B. Transtelco shall wait an additional seven (7) days from its government notice prior to notifying the affected customers of the breach.
 - C. Notwithstanding the provisions in subparagraph B above, Transtelco shall not wait the additional seven (7) days to notify its customers if Transtelco determines there is an immediate risk of irreparable harm to the customers.
 - D. Transtelco shall maintain records of discovered breaches for a period of at least two (2) years.
4. All employees will be trained as to when they are, and are not, authorized to use CPNI upon employment with the Company and annually thereafter.
 - A. Specifically, Transtelco shall prohibit its personnel from releasing CPNI based upon a customer-initiated telephone call except under the following three (3) circumstances:
 1. When the customer has pre-established a password.

2. When the information requested by the customer is to be sent to the customer's address of record, or
3. When Transtelco calls the customer's telephone number of record and discusses the information with the party initially identified by customer when service was initiated or, in the case of a business or institutional customer, formally updated by an official of the customer.

B. Transtelco may use CPNI for the following purposes:

- To initiate, render, maintain, repair, bill and collect for services;
 - To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
 - To provide inbound telemarketing, referral or administrative services to the customer during a customer initiated call and with the customer's informed consent.
 - To market additional services to customers that are within the same categories of service to which the customer already subscribes;
 - To market services formerly known as adjunct-to-basic services; and
 - To market additional services to customers with the receipt of informed consent via the use of opt-in or opt-out, as applicable.
5. Prior to allowing access to Customers' individually identifiable CPNI to Transtelcos' joint ventures or independent contractors, Transtelco will require, in order to safeguard that information, their entry into both confidentiality agreements that ensure compliance with this Statement and shall obtain opt-in consent from a customer prior to disclosing the information. In addition, Transtelco requires all outside Dealers and Agents to acknowledge and certify that they may only use CPNI for the purpose for which that information has been provided.
 5. Transtelco requires express written authorization from the customer prior to dispensing CPNI to new carriers, except as otherwise required by law.
 6. Transtelco does not market, share or otherwise sell CPNI information to any third party.
 7. Transtelco maintains a record of its own and its affiliates' sales and marketing campaigns that use Transtelcos' customers' CPNI. The record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign.
- A. Prior commencement of a sales or marketing campaign that utilizes CPNI, Transtelco establishes the status of a customer's CPNI approval. The following sets forth the procedure followed by Transtelco.
- Prior to any solicitation for customer approval, Transtelco will notify customers of their right to restrict the use of, disclosure of, and access to

their CPNI.

- Transtelco will use opt-in approval for any instance in which Transtelco must obtain customer approval prior to using, disclosing, or permitting access to CPNI.
 - A customer's approval or disapproval remains in effect until the customer revokes or limits such approval or disapproval.
 - Records of approval are saved for one year.
 - Transtelco provides individual notice to customers when soliciting approval to use, disclose, or permit access to CPNI.
 - The contents of Transtelcos' CPNI notices comply with FCC rule 64.2008 (c).
8. Transtelco will implement a system to obtain approval and informed consent from its customers prior to the use of CPNI for marketing purposes. This system will allow for the status of a customer's CPNI approval to be clearly established prior to the use of CPNI. To date Transtelco has not used CPNI for marketing purposes and has no plans to do so in the future.
 9. Transtelco has a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations and will maintain compliance records for at least one year. Specifically, Transtelcos' sales personnel will obtain express approval of any proposed outbound marketing request for customer approval of the use of CPNI by the General Counsel of Transtelco.
 10. Transtelco notifies customers immediately of any account changes, including address of record, authentication, online account and password related changes.
 11. Transtelco may negotiate alternative authentication procedures for services that Transtelco provides to business customers that have a dedicated account representative and a contract that specifically addresses Transtelcos' protection of CPNI.
 12. Transtelco is prepared to provide written notice within five days to the FCC of any instance where the opt-in mechanisms do not work properly to such a degree that customers' inability to opt-in is more than an anomaly.